

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:	:	CHAPTER 7
	:	
LIVINGSTON RAYMOND, and	:	
MARIE CADETTEL RAYMOND,	:	CASE NO.: 16-59238-PWB
	:	
DEBTORS.	:	
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**MOTION FOR ORDER AUTHORIZING
BANKRUPTCY RULE 2004 EXAMINATION**

The United States Trustee for Region 21 in furtherance of his administrative responsibilities imposed pursuant to 28 U.S.C. § 586(a) files this Motion for Order Authorizing Bankruptcy Rule 2004 Examination of Debtors and in support therefor states as follows:

1.

The debtors filed a voluntary petition under chapter 7 of the Bankruptcy Code on May 27, 2016 (the “Filing Date”).

2.

The debtors are individuals and their petition indicates that their debts are primarily consumer debts.

3.

The United States Trustee is in the process of reviewing this case to determine whether to file a motion to dismiss this case pursuant to Bankruptcy Code section 707(b) or object to the debtor’s discharge pursuant to section 727.

4.

The United States Trustee requests that debtor be directed to appear for examination at the Office of the United States Trustee, 75 Ted Turner Drive, SW, Third Floor, Atlanta, GA

30303., on **August 2, 2016 at 2:00 P.M.**, or at some other place and time as agreed to by the parties in interest.

5.

The United States Trustee requests the debtor provide the following documents (the “Documents”):

- a. Any and all retainer agreements that the debtors have entered into with any attorney within the one year prior to the Filing Date;
- b. Any and all documents indicating payments made to any attorney within the one year prior to the Filing Date;
- c. Any and all documents pertaining to the debtors’ financial application for their Toyota Rav-4, purchased in January of 2016;
- d. Any and all documents pertaining to the debtors’ financial application for their BMW x5, purchased in January of 2016;
- e. Any and all financial applications made by the debtors for the funding of their purchases of their Toyota Rav-4 and BMW x5, respectively;
- f. Any and all documents describing the terms of the loan(s) taken by the debtors in connection with the purchase of their Toyota Rav-4 and BMW x5;
- g. Any and all documents that relied upon by the debtors to calculate the value of their personal property on their schedule B of their bankruptcy petition.

6.

The debtors should provide the Documents **no later than July 29, 2016**, to the Office of the United States Trustee, Attn: Martin P. Ochs, 75 Ted Turner Drive, SW, Atlanta, GA 30303.

WHEREFORE, the United States Trustee prays for the entry of an Order directing the Debtor to produce the Documents and to appear to be examined pursuant to Bankruptcy Rule 2004, and for such further relief as the court deems appropriate.

GUY G. GEBHARDT,
ACTING UNITED STATES TRUSTEE
REGION 21

s/ Martin P. Ochs

MARTIN P. OCHS

NY Bar No. MO-1203

GA Bar No. 091608

United States Department of Justice

Office of the United States Trustee

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Atlanta, Georgia 30303

(404)-331-4437

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the United States Trustee's Motion for Order Authorizing Bankruptcy Rule 2004 Examination was sent by First Class United States

Mail to the following parties in interest:

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This 18th day of July, 2016

s/ Martin P. Ochs
Martin P. Ochs